



Managing Gasoline Dispenser Fuel Filters and Wastes Associated with the Operation of Fuel Dispensing Systems

Hazardous Waste Program fact sheet

10/2009

Used gasoline dispenser fuel filters and other fuel dispensing system wastes, such as absorbent materials, water and debris, can be toxic, ignitable and hazardous to people, property and the environment. Sometimes these wastes are illegally thrown into dumpsters or stored in ways that can lead to fires and explosions. The following guidance provides options for safely and legally managing used gasoline dispenser fuel filters and other media impacted by gasoline spills. This guidance does not pertain to the management of petroleum debris and media that is subject to 40 CFR part 280 subparts E and F.

Common Problem

The Missouri Department of Agriculture's most issued violation is gasoline dispenser fuel filters or other waste stored in the sump containment beneath the dispenser. During an inspection, the violation typically cited in the Missouri Secretary of States Code of State Regulations as 2 CSR 90-30:

"Water or product shall not be allowed to accumulate within any secondary containment facility, this includes dikes and remote impoundments. Accumulated water and/or product within a secondary containment facility shall be removed and disposed of in a manner that is in compliance with applicable rules of the Department of Natural Resources."

Gasoline dispenser fuel filters, absorbents or any other materials, including gasoline waste, may not be stored or dried in the sump containment. The sump containment is designed to hold gasoline product in the event of a release, any material stored in the sump containment reduces its capacity. The sump containment is intended only for abnormal operating conditions or emergency use. Storing gasoline dispenser fuel filters in the sump containment is also a fire hazard. Equipment in the dispenser can spark, igniting gasoline vapors and can cause a fire or explosion.

Proper management of used gasoline dispenser fuel filters

Scrap Metal Option

Metal gasoline dispenser fuel filters can be managed as scrap metal if the filters are drained of all liquids and the filters are sent for legitimate metal recycling.

Once drained and dried, metal gasoline tank dispenser filters should be stored in a closed container. The container should be labeled "scrap metal - gasoline dispenser fuel filters" and be sent to a scrap metal recycler with whom you have a written agreement and has the equipment to manage this type of metal and material. The Department of Natural Resources recommends you regularly contact your recycler to evaluate if scrap metal is being properly managed.

Hazardous Waste Option

Gasoline dispenser fuel filters and other related materials not destined for recycling should be considered hazardous waste since they are likely to contain enough benzene to be a toxic hazardous waste and they meet no other exemption. Gasoline dispenser fuel filters may only be considered an exempt scrap metal when drained and sent to a legitimate metal recycler.

Gasoline dispenser fuel filters intended for disposal must be managed as a hazardous waste, unless representative sampling demonstrates the wastes are not hazardous. If they contain free liquid, gasoline dispenser fuel filters are typically hazardous waste due to ignitability. If they are dry, but stored under high-heat conditions, they may spontaneously combust.

If you choose to characterize the gasoline dispenser fuel filters to determine if the waste is hazardous, the filters should be sampled for ignitability, also known as the flashpoint test, and benzene using the Toxicity Characteristic Leaching Procedure, or TCLP. If TCLP results show the wastes are at or above 0.5 mg/l (milligrams per liter) for benzene, if the filters fail the flashpoint test or if they are not tested, the gasoline dispenser fuel filters must be managed as hazardous waste. For more information about managing hazardous waste, see the fact sheet *Does Your Business Generate Hazardous Waste?* available on the department's Web site at dnr.mo.gov/pubs/pub117.pdf.

Permitted Sanitary Landfill Option

If the results of representative samples show the gasoline dispenser fuel filters are below .5 mg/l for benzene and they do not fail the flashpoint test, they are not hazardous and may be sent to a permitted sanitary landfill. Testing results must be retained for a period of three years.

Safe Gasoline Dispenser Fuel Filter Draining Practices

If managing on-site for recycling, metal gasoline tank dispenser filters must be drained and dried over a suitable container such as a drum or bucket so there is no release of gasoline product to the environment. Dry filters must then be placed in a closed container prior to being sent to a legitimate metal recycler. Absorbent materials such as pads, socks or booms used to absorb gasoline spills may be dried over an open container similar to the method used to drain and dry gasoline tank filters.

Other important draining practices are:

- Never place or drain gasoline dispenser fuel filters in a containment sump. This violates Department of Agriculture regulations.
- Do not throw gasoline dispenser fuel filters or absorbents in the trash. Wastes containing gasoline can cause fires or explosions.
- Do not dry gasoline dispenser fuel filters outdoors. Precipitation can cause the container to overflow and release gasoline waste to the environment.
- Do not drain gasoline dispenser fuel filters or absorbents to the sewer. Wastes containing gasoline can cause fires or explosions in the sewer and conventional wastewater treatment plants and septic systems are not designed to handle these wastes. Storm sewers often drain to streams and lakes, and wastes containing gasoline can cause harm to fish and other aquatic organisms
- Do not pour gasoline on the ground. Waste gasoline from the drying of gasoline dispenser fuel filters or absorbents can contaminate the land, water and drinking water wells.

Managing captured gasoline - Residual gasoline product must be managed according to guidance explained in the fact sheet *Management of Petroleum Storage Tank Wastes* available online at dnr.mo.gov/pubs/pub2040.pdf or by contacting the Hazardous Waste Program at 573-751-3176. Captured gasoline product may also be sold if it meets Missouri Department of Agriculture fuel specifications.

What contractors should know

Contractors may transport drained metal filters to a legitimate metal recycler. Additionally, contractors may store and accumulate the drained metal filters at their facility as long as the filters will be recycled as scrap metal.

However, contractors may not transport, store or accumulate hazardous gasoline dispenser fuel filters, used absorbents contaminated with gasoline or petroleum contaminated water destined for disposal, unless the contractor's site has a license, permit or certification from the state to transport or accept hazardous waste.

Ultimately, the burden rests on the generator to make a hazardous determination on filters, absorbents and petroleum contaminated water and to ensure their wastes are managed appropriately.

For more information

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Missouri Department of Natural Resources
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dnr.mo.gov/env/swmp/index.html

Missouri Department of Agriculture
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mda.mo.gov/wm/ppaa.htm